

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA**

**Fill in this information to identify your case:**

Debtor 1	<b>Sandra D. Dunston</b>		
	First Name	Middle Name	Last Name
Debtor 2 (Spouse, if filing)			
	First Name	Middle Name	Last Name
Case number (If known)	<b>19-60282</b>		

☒ Check if this is an amended plan.**Chapter 13 Plan and Motion**

[Pursuant to Fed. R. Bankr. P. 3015.1, the Southern District of Georgia General Order 2017-3 adopts this form in lieu of the Official Form 113].

**1. Notices. Debtor(s) must check one box on each line to state whether or not the plan includes each of the following items. If an item is checked as not being contained in the plan or if neither or both boxes are checked, the provision will be ineffective if set out in the plan.**

- (a) This plan: ☒ contains nonstandard provisions. See paragraph 15 below.  
☐ does not contain nonstandard provisions.
- (b) This plan: ☒ values the claim(s) that secures collateral. See paragraph 4(f) below.  
☐ does not value claim(s) that secures collateral.
- (c) This plan: ☐ seeks to avoid a lien or security interest. See paragraph 8 below.  
☒ does not seek to avoid a lien or security interest.

**2. Plan Payments.**

- (a) The Debtor(s) shall pay to the Chapter 13 Trustee (the "Trustee") the sum of **\$395.00** for the applicable commitment period of:

☐ 60 months: or☒ a minimum of 36 months. See 11 U.S.C. § 1325(b)(4).

(If applicable include the following: These plan payments will change to \$\_\_\_\_\_ monthly on \_\_\_\_\_.)

- (b) The payments under paragraph 2(a) shall be paid:

☐ Pursuant to a Notice to Commence Wage Withholding, the Debtor(s) request(s) that the Trustee serve such Notice(s) upon the Debtor's(s) employer(s) as soon as practicable after the filing of this plan. Such Notice(s) shall direct the Debtor's(s) employer(s) to withhold and remit to the Trustee a dollar amount that corresponds to the following percentages of the monthly plan payment:

☐ Debtor 1 \_\_\_\_\_% ☐ Debtor 2 \_\_\_\_\_%

☒ Direct to the Trustee for the following reason(s):

☒ The Debtor(s) receive(s) income solely from self-employment, Social Security, government assistance, or retirement.

☐ The Debtor(s) assert(s) that wage withholding is not feasible for the following reason(s):

- (c) Additional Payments of **\$0.00** (estimated amount) will be made on \_\_\_\_\_, (anticipated date) from (source, including income tax refunds).

**3. Long-Term Debt Payments.**

- (a) **Maintenance of Current Installment Payments.** The Debtor(s) will make monthly payments in the manner specified as follows on the following long-term debts pursuant to 11 U.S.C. § 1322(b)(5). These postpetition payments will be disbursed by either the Trustee or directly by the Debtor(s), as specified below. Postpetition payments are to be applied to postpetition amounts owed for principal, interest, authorized postpetition late charges and escrow, if applicable. Conduit payments that are to be made by the Trustee which

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become due after the filing of the petition but before the month of the first payment designated here will be added to the prepetition arrearage claim.

CREDITOR	COLLATERAL	PRINCIPAL RESIDENCE (Y/N)	PAYMENTS TO MADE BY (TRUSTEE OR DEBTOR(S))	MONTH OF FIRST POSTPETITION PAYMENT TO CREDITOR	INITIAL MONTHLY PAYMENT
The Claxton Bank	3.37 acres of real property and a house located at 806 Turnpike Road, Claxton, GA	Yes	Debtor	August	\$418.00

(b) **Cure of Arrearage on Long-Term Debt.** Pursuant to 11 U.S.C. § 1322(b)(5), prepetition arrearage claims will be paid in full through disbursements by the Trustee, with interest (if any) at the rate stated below. Prepetition arrearage payments are to be applied to prepetition amounts owed as evidenced by the allowed claim.

CREDITOR	DESCRIPTION OF COLLATERAL	PRINCIPAL RESIDENCE (Y/N)	ESTIMATED AMOUNT OF ARREARAGE	INTEREST RATE ON ARREARAGE (if applicable)
The Claxton Bank	3.37 acres of real property and a house located at 806 Turnpike Road, Claxton, GA	Yes	\$3,193.00	0.00%

4. **Treatment of Claims.** From the payments received, the Trustee shall make disbursements as follows unless designated otherwise:
- (a) **Trustee's Fees.** The Trustee percentage fee as set by the United States Trustee.
  - (b) **Attorney's Fees.** Attorney's fees allowed pursuant to 11 U.S.C. § 507(a)(2) of \$4,500.00.
  - (c) **Priority Claims.** Other 11 U.S.C. § 507 claims, unless provided for otherwise in the plan will be paid in full over the life of the plan as funds become available in the order specified by law.
  - (d) **Fully Secured Allowed Claims.** All allowed claims that are fully secured shall be paid through the plan as set forth below.

CREDITOR	DESCRIPTION OF COLLATERAL	ESTIMATED CLAIM	INTEREST RATE	MONTHLY PAYMENT
<b>-NONE-</b>				
(e)	<b>Secured Claims Excluded from 11 U.S.C. § 506 (those claims subject to the hanging paragraph of 11 U.S.C. § 1325(a)).</b> The claims listed below were either: (1) incurred within 910 days before the petition date and secured by a purchase money security interest in a motor vehicle acquired for the personal use of the Debtor(s), or (2) incurred within 1 year of the petition date and secured by a purchase money security interest in any other thing of value. These claims will be paid in full under the plan with interest at the rate stated below:			

CREDITOR	DESCRIPTION OF COLLATERAL	ESTIMATED CLAIM	INTEREST RATE	MONTHLY PAYMENT
<b>-NONE-</b>				
(f)	<b>Valuation of Secured Claims to Which 11 U.S.C. § 506 is Applicable.</b> The Debtor(s) move(s) to value the claims partially secured by collateral pursuant to 11 U.S.C. § 506 and provide payment in satisfaction of those claims as set forth below. The unsecured portion of any bifurcated claims set forth below will be paid pursuant to paragraph 4(h) below. The plan shall be served on all affected creditors in compliance with Fed. R. Bankr. P. 3012(b), and the Debtor(s) shall attach a certificate of service.			

CREDITOR	DESCRIPTION OF COLLATERAL	VALUATION OF SECURED CLAIM	INTEREST RATE	MONTHLY PAYMENT
WS Badcock Corp	Miscellaneous Furniture and all other collateral	\$2,400.00	7.00%	Min.\$45.00

- (g) **Special Treatment of Unsecured Claims.** The following unsecured allowed claims are classified to be paid at 100%

☐ with interest at \_\_\_\_% per annum; or ☐ without interest:  
None

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- (h) **General Unsecured Claims.** Allowed general unsecured claims, including the unsecured portion of any bifurcated claims provided for in paragraph 4(f) or paragraph 9 of this plan, will be paid a 100.00% dividend or a pro rata share of \$9,490.00, whichever is greater.

5. **Executory Contracts.**

- (a) **Maintenance of Current Installment Payments or Rejection of Executory Contract(s) and/or Unexpired Lease(s).**

CREDITOR	DESCRIPTION OF PROPERTY/SERVICES AND CONTRACT	ASSUMED/REJECTED	MONTHLY PAYMENT	DISBURSED BY TRUSTEE OR DEBTORS
<b>-NONE-</b>				

- (b) **Treatment of Arrearages.** Prepetition arrearage claims will be paid in full through disbursements by the Trustee.

CREDITOR	ESTIMATED ARREARAGE
<b>-NONE-</b>	

6. **Adequate Protection Payments.** The Debtor(s) will make pre-confirmation lease and adequate protection payments pursuant to 11 U.S.C. § 1326(a)(1) on allowed claims of the following creditors: ☐ Direct to the Creditor; or ☐ To the Trustee

CREDITOR	ADEQUATE PROTECTION OR LEASE PAYMENT AMOUNT
<b>-NONE-</b>	

7. **Domestic Support Obligations.** The Debtor(s) will pay all postpetition domestic support obligations direct to the holder of such claim identified here. See 11 U.S.C. § 101(14A). The Trustee will provide the statutory notice of 11 U.S.C. § 1302(d) to the following claimant(s):

CLAIMANT	ADDRESS
<b>-NONE-</b>	

8. **Lien Avoidance.** Pursuant to 11 U.S.C. § 522(f), the Debtor(s) move(s) to avoid the lien(s) or security interest(s) of the following creditor(s), upon confirmation but subject to 11 U.S.C. § 349, with respect to the property described below. The plan shall be served on all affected creditor(s) in compliance with Fed. R. Bankr. P. 4003(d), and the Debtor(s) shall attach a certificate of service.

CREDITOR	LIEN IDENTIFICATION (if known)	PROPERTY
<b>-NONE-</b>		

9. **Surrender of Collateral.** The following collateral is surrendered to the creditor to satisfy the secured claim to the extent shown below upon confirmation of the plan. The Debtor(s) request(s) that upon confirmation of this plan the stay under 11 U.S.C. § 362(a) be terminated as to the collateral only and that the stay under 11 U.S.C. § 1301 be terminated in all respects. Any allowed deficiency balance resulting from a creditor's disposition of the collateral will be treated as an unsecured claim in paragraph 4(h) of this plan if the creditor amends its previously-filed, timely claim within 180 days from entry of the order confirming this plan or by such additional time as the creditor may be granted upon motion filed within that 180-day period.

CREDITOR	DESCRIPTION OF COLLATERAL	AMOUNT OF CLAIM SATISFIED
<b>-NONE-</b>		

10. **Retention of Liens.** Holders of allowed secured claims shall retain the liens securing said claims to the full extent provided by 11 U.S.C. § 1325(a)(5).
11. **Amounts of Claims and Claim Objections.** The amount, and secured or unsecured status, of claims disclosed in this plan are based upon the best estimate and belief of the Debtor(s). An allowed proof of claim will supersede those estimated claims. In accordance with the Bankruptcy Code and Federal Rules of Bankruptcy Procedure objections to claims may be filed before or after confirmation.
12. **Payment Increases.** The Debtor(s) will increase payments in the amount necessary to fund allowed claims as this plan proposes, after notice from the Trustee and a hearing if necessary, unless a plan modification is approved.
13. **Federal Rule of Bankruptcy Procedure 3002.1.** The Trustee shall not pay any fees, expenses, or charges disclosed by a creditor pursuant to Fed. R. Bankr. P. 3002.1(c) unless the Debtor(s)' plan is modified after the filing of the notice to provide for payment of such fees, expenses, or charges.
14. **Service of Plan.** Pursuant to Fed. R. Bankr. P. 3015(d) and General Order 2017-3, the Debtor(s) shall serve the Chapter 13 plan on the Trustee and all creditors when the plan is filed with the court, and file a certificate of service accordingly. If the Debtor(s) seek(s) to limit

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the amount of a secured claim based on valuation of collateral (paragraph 4(f) above), seek(s) to avoid a security interest or lien (paragraph 8 above), or seek(s) to initiate a contested matter, the Debtor(s) must serve the plan on the affected creditors pursuant to Fed. R. Bankr. P. 7004. See Fed. R. Bankr. P. 3012(b), 4003(d), and 9014.

15. **Nonstandard Provisions.** Under Fed. R. Bankr. P. 3015(c), nonstandard provisions must be set forth below. A nonstandard provision is a provision not otherwise in this local plan form or deviating from it. Nonstandard provisions set out elsewhere in this plan are void.

**Regional Acceptance will be paid outside of the plan by Shanice Reynolds.**  
**TitleMax will be paid outside of the Plan by Debtor.**

By signing below, I certify the foregoing plan contains no nonstandard provisions other than those set out in paragraph 15.

Dated: 11/11/19

/s/ Sandra D. Dunston  
Sandra D. Dunston

*Debtor 1*

\_\_\_\_\_  
*Debtor 2*

/s/ J. Michael Hall  
J. Michael Hall 319333

*Attorney for the Debtor(s)*

**United States Bankruptcy Court  
For the Southern District of Georgia**

<b>In the Matter of:</b>	)	<b>Chapter 13 Bankruptcy</b>
	)	
<b>Sandra D. Dunston,</b>	)	
	)	
	)	<b>Case No.: 19-60282-EJC</b>
	)	
<b>Debtor.</b>	)	

**CERTIFICATE OF SERVICE**

I certify that I have served the Chapter 13 Plan by United States standard first-class mail to the Chapter 13 Trustee, the US Trustee and on the following parties below on the attached mailing matrix:

O. Byron Meredith, III  
Chapter 13 Trustee  
PO Box 10556  
Savannah, GA 31412

Office of the U.S. Trustee  
Johnson Square Business Center  
2 E Bryan Street, Ste. 725  
Savannah, GA 31401

This 11 day of November, 2019.

/s/ J. Michael Hall  
Attorney Bar No. 319333  
Attorney for Debtor  
Hall & Navarro, LLC  
5 Oak Street  
Statesboro, GA 30458  
Telephone: (912) 764-6757  
E-Mail: mhall@hallnavarro.com

Label Matrix for local noticing  
113J-6  
Case 19-60282-EJC  
Southern District of Georgia  
Statesboro  
Mon Nov 11 17:11:36 EST 2019

Comenity Bank/Goody's  
PO Box 182789  
Columbus OH 43218-2789

Directv, LLC  
by American InfoSource as agent  
4515 N Santa Fe Ave  
Oklahoma City, OK 73118-7901

GA Dept. of Revenue  
Compliance Division, ARCS-Bankruptcy  
1800 Century Blvd. NW, Ste. 9100  
Atlanta GA 30345

LNVV Funding, LLC  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

Office of the U. S. Trustee  
Johnson Square Business Center  
2 East Bryan Street, Ste 725  
Savannah, GA 31401-2638

Regional Acceptance Corp.  
1424 E East Fire Tower Road  
Greenville NC 27858

Shanice Reynolds  
806 Turnpike Road  
Claxton GA 30417-1866

Synchrony Bank c/o PRA Receivables Managemen  
PO Box 41021  
Norfolk, VA 23541-1021

(p)TMX FINANCE LLC FORMERLY TITLEMAX  
15 BULL STREET  
SUITE 200  
SAVANNAH GA 31401-2686

(p)BANK OF AMERICA  
PO BOX 982238  
EL PASO TX 79998-2238

Comenity Bank/Victoria Secret  
PO Box 182789  
Columbus OH 43218-2789

Sandra D. Dunston  
806 Turnpike Road  
Claxton, GA 30417-1866

J. Michael Hall  
Hall & Navarro, LLC  
5 Oak Street  
Statesboro, GA 30458-4848

MERRICK BANK  
Resurgent Capital Services  
PO Box 10368  
Greenville, SC 29603-0368

(p)PORTFOLIO RECOVERY ASSOCIATES LLC  
PO BOX 41067  
NORFOLK VA 23541-1067

Regional Acceptance Corporation  
PO Box 1847  
Wilson, NC 27894-1847

Social Security Administration  
1050 Brannen St  
Statesboro GA 30461-5805

The Claxton Bank  
P.O. Box 247  
Claxton GA 30417-0247

United States Attorney  
P.O. Box 8970  
Savannah GA 31412-8970

Charles J. Bowen  
The Bowen Law Group  
7 E Congress St, Ste 1001  
Savannah, GA 31401-3357

Credit One Bank  
PO Box 98872  
Las Vegas NV 89193-8872

First Premier Bank  
3820 N Louise Ave  
Sioux Falls SD 57107-0145

Internal Revenue Service  
Centralized Insolvency Operation  
PO Box 7346  
Philadelphia PA 19101-7346

O Byron Meredith III  
P O Box 10556  
Savannah, GA 31412-0756

Quantum3 Group LLC as agent for  
Comenity Bank  
PO Box 788  
Kirkland, WA 98083-0788

SYNCB/JC Penney  
PO Box 965007  
Orlando FL 32896-5007

Synchrony Bank  
c/o PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541-1021

Title Max of GA, Inc.  
dba Title Bucks  
1306 Northside Dr E  
Statesboro GA 30458-1007

W.S.Badcock Corporation  
Post Office Box 724  
Mulberry, FL 33860-0724

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4) .

Bank of America  
PO Box 982238  
El Paso TX 79998-2235

Portfolio Recovery Associates, LLC  
c/o Jc Penney  
POB 41067  
Norfolk VA 23541

TitleMax of Georgia, Inc.  
15 Bull Street, Suite 200  
Savannah, GA 31401

(d)WS Badcock Corp  
PO Box 232  
Mulberry FL 33860

End of Label Matrix  
Mailable recipients 30  
Bypassed recipients 0  
Total 30